

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

Case No. 4:13-cv-106

ONE 14K WHITE GOLD DIAMOND)
BAND WITH 24 ROUND FULL CUT)
DIAMONDS TOTALING 2.88 CARATS,)

ONE 14K WHITE GOLD DIAMOND)
BAND WITH 18 ROUND FULL CUT)
DIAMONDS TOTALING 2.52 CARATS,)

and)

VERIFIED COMPLAINT *IN REM*

ONE 14K WHITE GOLD DIAMOND)
SOLITAIRE RING WITH OVAL)
BRILLIANT CUT DIAMOND OF 1.65)
CARATS,)

Defendants.)

Plaintiff the United States of America, brings this complaint and alleges as follows in
accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is an action to forfeit property to the United States pursuant to 18 U.S.C.
§ 981(a)(1)(c).

DEFENDANT IN REM

2. The Defendant property consists of three rings further described as:

- a. One 14k white gold diamond band with 24 round full cut diamonds
totaling 2.88 carats;
- b. One 14k white gold diamond band with 18 round full cut diamonds
totaling 2.52 carats; and

- c. One 14k white gold diamond solitaire ring with oval brilliant cut diamond of 1.65 carats.

JURISDICTION AND VENUE

3. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345 and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b) because the acts or omissions giving rise to the forfeiture occurred in this district and because the defendant property is located in this district.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in this district and under 28 U.S.C. § 1395(b) because the property was seized from and is located in this district.

BASIS FOR FORFEITURE

6. The Defendant property constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1343, wire fraud. As such, the property is liable to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FACTS

7. On September 27, 2012, Ralph L. Schippers pled guilty to a one count Information charging him with wire fraud in violation of 18 U.S.C. § 1343. (*United States v. Ralph L. Schippers*, S.D. Iowa, Criminal No. 4:12-cr-131).

8. Ralph L. Schippers was employed at a Des Moines area car dealer since 1995. He admitted to engaging in a scheme to give himself unauthorized payments from his employer since at least January 1998.

9. Ralph L. Schippers admitted that through unauthorized checks and ACH payments to himself he stole approximately \$1,417,187 from his employer from 1998 to 2012. Schippers' scheme was discovered in May 2012.

10. Ralph L. Schippers admitted that he used part of the \$1,417,187 he unlawfully embezzled from his employer to purchase goods and services for himself and his family. These included, among other things, jewelry purchased from Joseph's Jewelers.

11. The rings that constitute the Defendant property were purchased from Joseph's Jewelers by Ralph L. Schippers or his wife on or about April 1, 2012 (ring described in ¶ 2(a)); November 21, 2011 (ring described in ¶ 2(b)); and October 5, 2011 (ring described in ¶ 2(c)).

12. The rings that constitute the Defendant property were purchased with proceeds of the criminal conduct engaged in by Ralph L. Schippers.

CLAIM FOR RELIEF

WHEREFORE, the United States prays that the Defendant property be forfeited to the United States, that the Plaintiff be awarded its costs and disbursements in this action and for such other and further relief as the Court deems property and just.

Respectfully submitted,

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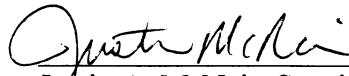
VERIFICATION

I, Special Agent Justin A. McNair, hereby verify and declare under penalty of perjury that I am a Special Agent of the Federal Bureau of Investigation (FBI), U.S. Department of Justice, that I have read the foregoing Verified Complaint in Rem and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters, I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States and information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as an agent of the FBI.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: March 4, 2013.


Justin A. McNair, Special Agent
Federal Bureau of Investigation